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January 8, 1998

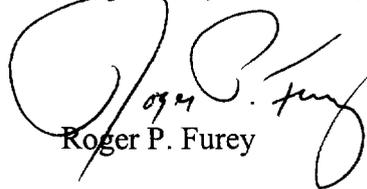
Office of the Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room Number 222  
Washington, D.C. 20554

Re: CC Docket No. 92-237; Administration of the  
North American Plan Carrier Identification Codes (CICs)

We have enclosed for filing in the above captioned matter an original and four (4) copies of the Reply Comments of VarTec Telecom, Inc. Please date-stamp the "Stamp and Return" copy of this filing and return with the messenger filing this Reply.

Should there be any questions concerning this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,



Roger P. Furey

RPF/rl  
Enclosures:  
As indicated.

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Administration of the )  
North American Numbering Plan )  
Carrier Identification Codes (CICs) )

CC Docket No. 92-237

**REPLY COMMENTS OF VARTEC TELECOM, INC.**

VarTec Telecom, Inc. ("VarTec") now files these comments in reply to the comments and oppositions filed by the Telecommunications Resellers Association ("TRA"), Southwestern Bell Telephone Company, Pacific Bell and Nevada Bell (the "SBC Companies"), AT&T Corp. ("AT&T") and U S West, Inc. ("U S West").

VarTec concurs with the comments recently filed by TRA regarding the Petition for Reconsideration filed by America One Communications, Inc. ("America One") of the Federal Communications Commission's ("Commission") Order on Reconsideration ("Reconsideration Order") in the above-referenced docket. Specifically, VarTec agrees with TRA's motion for the Commission to deny America One's Petition for Reconsideration as the two step transition period is required in order to provide the time necessary for local exchange carriers ("LECs") to make equipment modifications as well as the minimum time required for interexchange carriers ("IXCs") to educate consumers about the code expansion and also modify equipment. In fact, the numerous waivers granted by the Commission provide compelling evidence that the industry requires longer than June 30, 1998 in order to complete all of the equipment modification needed for the four-digit CIC conversion.

In addition, VarTec supports the SBC Companies' comments regarding BellSouth Corporation's ("BellSouth's") Petition for Clarification in this docket. It is the SBC Companies' position that BellSouth as well as the SBC Companies should be permitted to begin their programming efforts to block three-digit CICs after the four-digit CIC implementation deadline for IXCs, which is presently June 30, 1998. VarTec agrees that all consumers should be able to utilize a three-digit CIC through the end of the transition period for IXCs and that no LEC should be allowed to eliminate the use of a three-digit CIC prior to this deadline. Further, VarTec concurs with U S West's recent comments which state that U S West supports BellSouth's Petition for Clarification, and VarTec agrees that any clarification issued by the Commission be applicable to all involved LECs.

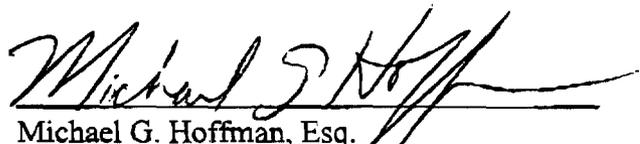
Finally, VarTec does not agree with AT&T's opposition to BellSouth's Petition for Clarification. BellSouth as well as other LECs listed herein have indicated a strong desire to adhere to the Commission's instruction on when to proceed in blocking consumers' ability to utilize a three-digit CIC. The LECs require approximately sixty days to completely eliminate the programming which allows for the use of three-digit CICs. VarTec opposes AT&T's position that BellSouth's Petition for Clarification be denied and agrees that BellSouth should be permitted to begin the phase out of the three-digit CICs after the end of the transition period to comply with the Commission's intent in implementing a two step transition period. In addition to the above-stated objections, VarTec also disagrees with AT&T's position that the Commission should not consider extending the transition beyond the June 30, 1998 deadline for expanding CICs to four digits. VarTec certainly supports extending the transition period in order to more thoroughly educate consumers and modify equipment.

In summary, VarTec supports those comments filed in this docket which specifically address concerns that would benefit the best interest of consumers while facilitating a smooth transition into the use of four-digit CICs for the LECs and IXCs required to make equipment modifications..

Respectfully submitted,

**VARTEC TELECOM, INC.**

By:



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January 8, 1997

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that service of the foregoing Reply Comments of VarTec Telecom, Inc. has been made by mailing a copy thereof, First-Class mail, postage prepaid this 8th day of January, 1998, to the following:

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